

# **EXHIBIT B**

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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UNITED STATES OF AMERICA,  
Plaintiff,

Case No. 1:20-CV-502  
Hon. Robert J. Jonker  
U.S. District Court Judge

- vs. -

DARRELL JONES, FATIMA JONES, and  
JONES INVESTING, LLC,  
Defendants.

\_\_\_\_\_ /

VIDEO CONFERENCE DEPOSITION OF

DEPONENT: FATIMA JONES

DATE: Wednesday, September 1, 2021

TIME: 9:06 a.m.

LOCATION: Video Conference via Zoom  
Michigan

REPORTED BY: JENNIFER DIANE CLAUSON, CSR-6867  
O'Brien & Bails Court Reporting  
(800) 878-8750

1 A. That's correct.

2 Q. As apart of that business, you and your husband purchase  
3 homes, correct?

4 A. Yes.

5 Q. As apart of that business, you and your husband sell  
6 homes, is that right?

7 A. We don't -- yes, let me say yes, yes.

8 Q. Is there anything you want to clarify?

9 A. I just wanted to clarify that we started off by buying  
10 properties and selling them and then we decided that we  
11 wanted to rent houses to keep properties instead of  
12 selling them so that we could have some retirement income.

13 Q. Okay. So as you mentioned, you also rent out homes as  
14 apart of the business?

15 A. Yes.

16 Q. Are there any other aspects of the business that we  
17 haven't covered?

18 A. No.

19 Q. Does your husband have any other sort of business or  
20 source of income aside from the real estate business?

21 A. No.

22 Q. When did you and your husband first get involved in the --  
23 the real estate business?

24 A. It may have been 2006 or 2008, somewhere in -- at least  
25 2006.

1 Q. Why did you decide to create Jones Investing, LLC?

2 A. We were advised by an attorney to create that to separate

3 our personal from our business, that if we were going to

4 be doing business, purchasing real estate, then we should

5 be having an LLC and so that -- that's what prompted us to

6 create the Jones Investing, LLC.

7 Q. Do you conduct all business associated with your rental

8 properties through Jones Investing, LLC?

9 A. No.

10 Q. What business do you conduct associated with your rental

11 properties not through Jones Investing?

12 A. Some of the properties are not owned or titled to Jones

13 Investing. Some of the properties are titled to Darrell

14 and Fatima Jones.

15 Q. Okay. Have you received any PPP payments as a result of

16 individual or tenants that are unable to pay?

17 A. Yes.

18 Q. How much have you received?

19 A. Approximately 70,000.

20 Q. When did you apply for those? Did you have to apply for

21 those?

22 A. Of course, yes.

23 Q. When did you apply?

24 A. I'm not sure of the dates that I applied, but we applied

25 for them twice.

1 Q. What are your responsibilities with regard to the business  
2 and what does your husband handle?

3 A. I review the applications to decide and to decipher if the  
4 information is accurate and real, if they have enough  
5 income, how many people want to rent the property, how big  
6 is the property for -- for this family. I do the lease  
7 agreements. I make contact with the employers and the  
8 previous landlords. I create a file for this family. I  
9 write the receipts out. I do whatever. I'm doing the  
10 paperwork. My husband he takes in the application. He  
11 will meet perspective clients at the property, opens the  
12 door for them, let them go and review it and tour it. If  
13 they are interested, they do fill out an application, he  
14 brings it back to me, and I determine whether or not they  
15 can rent that property.

16 Q. Okay. So I understand that you and your husband own some  
17 properties jointly, he owns some properties independently,  
18 and the LLC owns some properties, is that fair --

19 A. Yeah.

20 Q. -- is that correct?

21 A. That's correct.

22 Q. Does the division of labor that you just described apply  
23 across all of those properties regardless of who's listed  
24 as the owner?

25 A. Yes.